

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

TARRILL PETERS, JR.

Plaintiff,

v.

CITY OF CHICAGO, COOK COUNTY,

SERGEANT MICHAEL PETRASKI, STAR

NUMBER 21001, DETECTIVE NAN

MORALES, STAR NUMBER 20741,

DETECTIVE ARTHUR TARASZKIEWICZ,

STAR NUMBER 21183, DETECTIVE

JOSEPH MARSZALEC, STAR NUMBER

21234, DETECTIVE JOHN CAMPELL,

STAR NUMBER 21279, DETECTIVE

THOMAS FLAHERTY, STAR NUMBER

1732, ASSISTANT STATE'S ATTORNEY

MARTIN MOORE,

Defendants.

No. 21-cv-4366

Judge: Hon. Charles R. Norgle, Sr.

Magistrate: Hon. Susan E. Cox

**DEFENDANTS, COOK COUNTY and ASSISTANT STATE'S  
ATTORNEY MARTIN MOORE'S, UNOPPOSED MOTION FOR AN EXTENSION OF  
TIME TO RESPOND TO PLAINTIFF'S COMPLAINT**

Defendants, COOK COUNTY and ASSISTANT STATE'S ATTORNEY  
MARTIN MOORE ("County Defendants"), by and through their undersigned counsel,  
respectfully move this Court to extend their time to file a responsive pleading to plaintiff's  
Complaint and state the following in support of this motion:

1. The undersigned counsel was recently retained to represent these defendants in  
this litigation.

2. The undersigned counsel would like an additional seven days, or until November 15, 2021, to file its responsive pleading on behalf of these defendants.

3. On November 8, 2021, the undersigned counsel communicated with Plaintiff's counsel, who indicated that he has no objection to this requested extension.

4. The requested extension of time will not materially prejudice the Plaintiff's interest and is not being made to cause an unnecessary delay in the adjudication of this alleged dispute between the parties.

WHEREFORE, Defendants Cook County and Assistant State's Attorney Martin Moore respectfully request that this Court grant their motion and enter an order extending their time to answer or otherwise plead to Plaintiff's Complaint to November 15, 2021.

Respectfully submitted,

s/ William B. Oberts

Attorney for defendants, Cook County and  
Assistant State's Attorney Martin Moore

William B. Oberts, Esq.- # 6244723  
Amy M. Kunzer, Esq. - #6293176  
Tribler Orpett & Meyer, P.C.  
225 W. Washington, Suite 2550  
Chicago, IL 60606  
(312) 201-6400  
[wboberts@tribler.com](mailto:wboberts@tribler.com)  
[amkunzer@tribler.com](mailto:amkunzer@tribler.com)  
[docket@tribler.com](mailto:docket@tribler.com)

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of Defendants, Cook County and Assistant State's Attorney Martin Moore's, Unopposed Motion for an Extension of Time to Respond to Plaintiff's Complaint, was served upon:

<b><u>Attorneys for Plaintiff</u></b> Aaron J. Hersh Bianca L. Valdez Michael G. Babbitt Craig C. Martin Willkie Farr & Gallagher LLP 300 North LaSalle Chicago, IL 60654 312-728-9000 <a href="mailto:ahersh@willkie.com">ahersh@willkie.com</a> <a href="mailto:bvaldez@willkie.com">bvaldez@willkie.com</a> <a href="mailto:mbabbitt@willkie.com">mbabbitt@willkie.com</a> <a href="mailto:cmartin@willkie.com">cmartin@willkie.com</a>  Daniel Massoglia First Defense Legal Aid 601 S. California Ave. Chicago, IL 60612 336 575 6968 <a href="mailto:daniel@first-defense.org">daniel@first-defense.org</a>	<b><u>Attorneys for City of Chicago</u></b> Eydie R. Vanderbosch Eydie R. Vanderbosch, Esq. Legal and Consulting Services 10 S. Riverside Plaza Suite 875 Chicago, IL 60606 (312) 523-5299 <a href="mailto:eydie@ervjd.com">eydie@ervjd.com</a>  <b><u>Attorneys for Petraski, Morales, Taraszkiewicz, Marszalec, Campbell, Flaherty</u></b> Jessica L. Griff Gregory M. Beck City of Chicago Department of Law 2 N. LaSalle Street, Suite 420 Chicago, IL 60602 (312) 744-2826 <a href="mailto:Jessica.griff@cityofchicago.org">Jessica.griff@cityofchicago.org</a> <a href="mailto:Gregory.beck@cityofchicago.org">Gregory.beck@cityofchicago.org</a>
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service was accomplished pursuant to ECF as to Filing Users and complies with LR 5.5 on the 8<sup>th</sup> day of November, 2021.

s/ William B. Oberts  
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an Attorney